AstraZeneca

Date: SEP 20 2002

Dockets Management Branch
HFA-305, Room 1061
Food and Drug Administration
5630 Fishers Lane
Rockville, MD 20857

Re: Docket Number 02D-0350
Response to FDA Call for Comments
Draft Guidance for Industry on Handling and Retention of Bioavailability and Bioequivalence Testing Samples

Dear Sir/Madam:

Reference is made to the August 21, 2002 Federal Register Notice announcing the availability of Draft Guidance for Industry on Handling and Retention of Bioavailability and Bioequivalence Testing Samples.

AstraZeneca has reviewed this draft guidance and offers the following comments:

- Firms who undertake BA and BE studies in house would be expected to have Standard Operating Procedures for the security, accountability and traceability of testing samples as well as procedures for conducting the studies themselves. The recommendations that third parties be engaged in the selection of reserve samples, to witness dosing and retain the samples as stated in lines 349, 361 and 367 seem unnecessary. The supplementary information and background to the docket indicates that a frequent inspectional finding is the absence of reserve samples at the testing facility; there is no indication that there is evidence of insecure and inadequate procedures for in-house BA/BE studies. While the option to use a third be allowed, where in-house procedures do not adequately address security, accountability and traceability of the reserve samples, it is suggested the wording in line 349 amended to read "Third parties may be engaged for retention of reserve samples." Similarly, line 362 should be amended to read "An independent third party may be engaged to randomly select reserve samples and witness dosing." Additionally, line 367 should be read "An independent third party may be used for retention of reserve samples."

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US Regulatory Affairs
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- In Section III, further clarification is required for large batches of manufactured products, which have been packed into multiple containers by the manufacturer. It is inappropriate for all containers to be sent to the testing facility for random selection and the provision of a single, composite sample, representative of the batch is thought to be acceptable. While the current wording does not preclude the provision of a single, composite sample from a batch comprising of multiple containers, further guidance would be helpful.

- There is no guidance provided for the availability of an analytical reference standard (i.e., the active pharmaceutical ingredient), which may be used in quality control purposes. Guidance should be provided to describe whether the analytical reference standards should be retained with the reserve samples or if a (current) standard would be requested at the time the reserve samples are collected by the Agency.

Please contact me with any questions or requests for additional information.

Sincerely,

Lan-Chi Nguyen

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LCN\alw

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